

December 30, 2020

**BY ECF & E-MAIL**

The Honorable Andrew L. Carter, Jr.  
United States District Judge  
Southern District of New York  
40 Foley Square, Room 435  
New York, NY 10007

**MEMO ENDORSED**

USDC SDNY  
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DATE FILED: 1/4/2021

Re: *Kraiem v. JonesTrading Institutional Services, LLC., et al.*,  
19-CV-5160 (ALC)

Dear Judge Carter:

This firm represents Plaintiff Nefissa Kraiem in the above-referenced action. For the reasons set forth below, we respectfully write to request a one-day extension of Plaintiff's December 30, 2020 deadline to file a motion to amend to make operative the Second Amended Complaint currently on file, pursuant to the Court's December 2, 2020 Order. *See* ECF Nos. 83, 85. This request is made with Defendants' consent and does not affect any other scheduled dates.

Although counsel worked diligently to timely submit Plaintiff's papers, our firm's ability to meet its deadline was compromised by my need to attend to my quadriplegic son, who underwent a post-operative medical procedure on Monday, which took significantly longer than expected and prevented me from working on Plaintiff's submission. We sincerely apologize for not submitting the instant request sooner as required by Your Honor's Practice Rules, but we had initially hoped and expected to meet the filing deadline notwithstanding the aforementioned delay.

The parties previously submitted a joint request which sought extensions of the deadlines set forth in Your Honor's December 2, 2020 Order, which was granted. This request does not affect any other scheduled dates.

The Court's considerations are greatly appreciated.

Respectfully submitted,

/s/  
Robert B. Stulberg

*Andrew L. Carter, Jr.*  
SO ORDERED:  
HON. ANDREW L. CARTER, JR.  
UNITED STATES DISTRICT JUDGE

cc (by ECF and E-mail): Joan M. Gilbride, Esq.  
Laura Baldwin Juffa, Esq.

Dated: 1/4/2021